

Vanessa R. Waldref  
United States Attorney  
Eastern District of Washington  
Laurel J. Holland  
Assistant United States Attorney  
825 Jadwin Avenue  
Richland, WA 99352  
Telephone: (509) 353-2767

FILED IN THE U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

JAN 09 2024

SEAN F. MCAVOY, CLERK  
DEPUTY  
YAKIMA, WASHINGTON

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

GERALD ALAN NOTT,

Defendant.

4:24-CR-6001-MKD

INDICTMENT

Vio: 18 U.S.C. § 2252A(a)(2)(A)(b)(1)  
Distribution of Child Pornography  
(Count 1)

18 U.S.C. § 2252A(a)(5)(B), (b)(2)  
Possession of Child Pornography  
(Count 2)

18 U.S.C. § 2253  
Forfeiture Allegations

The Grand Jury charges:

COUNT 1

Between on or about December 29, 2022, and continuing through on or about March 16, 2023, in the Eastern District of Washington, the Defendant, GERALD ALAN NOTT, did knowingly distribute child pornography, as defined in 18 U.S.C. § 2256(8)(A), which had been mailed, shipped and transported in interstate commerce by any means, including by computer, to wit: images depicting minor and prepubescent children engaging in sexually explicit conduct,

1 including, but not limited to, the lascivious exhibition of the genitals and pubic  
2 area, in violation of 18 U.S.C. § 2252A(a)(2)(A), (b)(1).

3  
4 COUNT 2

5 On or about March 16, 2023, in the Eastern District of Washington, the  
6 Defendant, GERALD ALAN NOTT, did knowingly possess material that  
7 contained one or more visual depictions of child pornography, as defined in 18  
8 U.S.C. § 2256(8)(A), including images of prepubescent minors and minors who  
9 had not attained twelve years of age, the production of which involved the use of a  
10 minor engaging in sexually explicit conduct, and which visual depictions were of  
11 such conduct; which had been mailed, shipped and transported in interstate and  
12 foreign commerce, and which were produced using materials that had been mailed,  
13 shipped and transported in interstate or foreign commerce, by any means including  
14 computer, all in violation of 18 U.S.C. § 2252A(a)(5)(B), (b)(2).

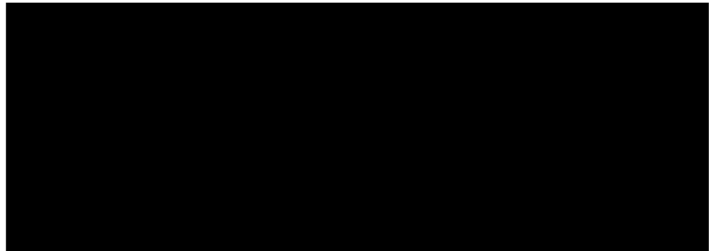
15 NOTICE OF FORFEITURE ALLEGATIONS

16 The allegations set forth in this Indictment are hereby realleged and  
17 incorporated by reference for the purpose of alleging forfeitures. Pursuant to 18  
18 U.S.C. § 2253, upon conviction of any of the child pornography charges set forth  
19 in Counts 1 or 2 of this Indictment, the Defendant, GERALD ALAN NOTT, shall  
20 forfeit to the United States any visual depiction described in section 2251, 2251A,  
21 2252, 2252A, 2252B, or 2260, or any book, magazine, periodical, film, videotape,  
22 or other matter which contains any such visual depiction, which was produced,  
23 transported, mailed, shipped or received in violation of this chapter; any property,  
24 real or personal, constituting or traceable to gross profits or other proceeds  
25 obtained from such offenses; and, any property, real or personal, used or intended  
26 to be used to commit or to promote the commission of such offenses, or any  
27 property traceable to such property, including but not limited to:  
28

- a Samsung Tablet, serial number R52N60PMDHB, and/or
- a Samsung Tablet, serial number R52J6012KGT.

DATED this 9 day of January, 2024.

A TRUE BILL



Vanessa R. Waldref  
Vanessa R. Waldref  
United States Attorney

Laurel J. Holland  
Laurel J. Holland  
Assistant United States Attorney